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Attorneys for the Warner Parties

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

FOURTH AGE LTD., *et al*,

Plaintiffs,

v.

WARNER BROS. DIGITAL
DISTRIBUTION, *et al*,

Defendants.

WARNER BROS. DIGITAL
DISTRIBUTION INC., *et al*,

Counterclaim
Plaintiffs,

v.

FOURTH AGE LTD., *et al*,

Counterclaim
Defendants.

Case No. 12-9912-ABC (SHx)

DISCOVERY MATTER

**DECLARATION OF MOLLY M.
LENS IN SUPPORT OF
WARNER'S OPPOSITION TO
MOTION FOR PROTECTIVE
ORDER RE: PRISCILLA
TOLKIEN TRANSCRIPT**

Judge: Hon. Audrey B. Collins
Magistrate: Hon. Stephen J. Hillman

Hearing Date: June 30, 2014
Hearing Time: 2:00 p.m.
Hearing Place: Ctrm. 550, Roybal
Building
Discovery Cut-Off: July 29, 2014
Action Filed: November 19, 2012
**Trial, Pretrial Conf., and Motion
Cutoff:** Vacated

LENS DECLARATION IN SUPPORT OF
WARNER'S OPPOSITION TO
MOTION FOR PROTECTIVE ORDER
CASE NO. 12-9912-ABC (SHX)

1 I, Molly M. Lens, the undersigned, hereby declare:

2 1. I am a member in good standing of the State Bar of California, an
3 attorney in the law firm of O'Melveny & Myers LLP, and counsel for defendants
4 and counterclaim plaintiffs Warner Bros. Home Entertainment Inc., Warner Bros.
5 Entertainment Inc., Warner Bros. Consumer Products Inc., and New Line
6 Productions, Inc. (collectively, "Warner"). I submit this declaration in support of
7 Warner's Opposition to the Tolkien/HC Parties' Motion for Protective Order re:
8 Priscilla Tolkien Transcript. I have personal knowledge of the facts set forth herein
9 and, if called to testify, could and would testify competently thereto.

10 2. In March 2013, prior to the entry of the protective order in this case,
11 the Tolkien/HC Parties threatened to file publicly with their anti-SLAPP motion
12 copies of a number of highly confidential agreements between the parties. These
13 agreements included settlement agreements which, in addition to containing
14 sensitive financial information, also included specifically negotiated confidentiality
15 provisions of their own. Accordingly, I wrote to Ricardo Cestero, counsel for the
16 Tolkien/HC Parties, on March 28, 2013 to express Warner's concern about
17 protecting this confidential information, and to insist that any copies of these
18 agreements be filed under seal. Mr. Cestero responded later that day that the
19 Tolkien/HC Parties did not believe any of these agreements contained confidential
20 information. Attached as **Exhibit 1** is a true and correct copy of my March 2013
21 correspondence with Mr. Cestero.

22 3. On April 29, 2013, Ricardo Cestero filed a declaration in support of
23 the Tolkien/HC Parties Motion to Strike Warner's Amended Counterclaims.
24 (Docket No. 69.) Attached to the declaration as Exhibit 1 was a confidential
25 settlement agreement between Warner and Microgaming Software Systems Ltd,
26 which had been designated confidential. (Docket No. 69-1.) After the Tolkien/HC
27 Parties refused to withdraw the agreement or file it under seal, Warner filed an *Ex*

1 *Parte Application* to have the settlement agreement sealed. (Docket No. 73.) The
 2 Tolkien/HC Parties did not oppose the *ex parte* application, but they filed a Non-
 3 Opposition to the *Ex Parte* Application, in which they stated that, while they did
 4 not oppose the current application to seal, they believed that “any party who wants
 5 to have documents filed or used under seal must satisfy the relevant standard that
 6 have been set forth in the relevant statutory and case law.” They further stated that
 7 the parties should not “restrict the public’s access to the facts of this case.”
 8 Attached as **Exhibit 2** is a true and correct copy of the Tolkien/HC Parties Non
 9 Opposition, which is Docket No. 75, filed on May 2, 2013.

10 4. During the parties’ Rule 26(f) conference in March 2013, the parties
 11 agreed to enter into a stipulated protective order to govern the exchange of
 12 confidential information. The parties then negotiated what constituted confidential
 13 information and what information would be protected under the protective order.
 14 Warner proposed that all depositions be marked confidential in their entirety. The
 15 Tolkien/HC Parties rejected this proposal. They stated that such a provision was
 16 “overly broad and would subject plainly non-confidential testimony to the
 17 protective order provisions.” They further argued that the parties must “identify
 18 specific portions of the transcripts to be designated confidential.” Attached as
 19 **Exhibit 3** is a true and correct copy of Ricardo Cestero’s May 3, 2013 email,
 20 setting forth the Tolkien/HC Parties’ positions.

21 5. On May 14, 2014, after Warner objected to the Tolkien/HC Parties’
 22 blanket confidentiality designation over all of Priscilla Tolkien’s deposition
 23 testimony, Ms. Valadez, Mr. Cestero, and myself conducted a telephonic meet and
 24 confer. During this meet and confer, I reiterated Warner’s objection to the
 25 confidentiality designation and explained that the blanket designation was improper
 26 under the protective order. Counsel for the Tolkien/HC Parties did not explain or
 27 show how the entirety of the deposition was confidential. Rather, they accused
 28

1 Warner of having an improper motive to release the deposition to the press. I
2 assured counsel for the Tolkien/HC Parties that Warner had no such current
3 intention. I further explained that the blanket confidentiality designation would
4 impose burdens on the parties and the court and asked counsel for the Tolkien/HC
5 Parties to provide specific designations for Warner to consider.

6 6. An Internet search for Priscilla Tolkien reveals that she has written
7 articles and books concerning her father and the Tolkien Works, hosts an annual
8 event for the Tolkien Society, has spoken at numerous events, and has provided
9 numerous interviews to media outlets. Attached as **Exhibit 4** is a true and correct
10 copy of webpages setting forth various books and articles Ms. Tolkien has written,
11 interviews she has given, and events she has spoken at.

12
13 I declare under penalty of perjury that the foregoing is true and correct.
14 Executed on June 4, 2014, at Los Angeles, California.

15
16 

17 _____
Molly M. Lens

EXHIBIT 1

Primack, Nikolas A.

From: Cestero, Ricardo <rcestero@greenbergglusker.com>
Sent: Thursday, March 28, 2013 5:17 PM
To: Callagy, Sean M.; Lens, Molly
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.; Ulin, John C.; Glick, Martin R.; Jih, Victor
Subject: RE: Today's filings

Counsel-

Now that we have received Zaentz's confirmation, we are proceeding to file our motions at this time without the Binding Term Sheet, the Hobbit Binding Term Sheet and the Regrant Agreement, subject to further discussions among the parties as to how to handle the issue of filing under seal. However, Plaintiffs reserve the right to file redacted versions of these documents if the parties are unable to come to an agreement.

Regards,
Ricardo

From: Callagy, Sean M. [mailto:Sean.Callagy@aporter.com]
Sent: Thursday, March 28, 2013 5:05 PM
To: Cestero, Ricardo; Lens, Molly
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.; Ulin, John C.; Glick, Martin R.; Jih, Victor
Subject: RE: Today's filings

Ricardo,

We appreciate your concern. We confirm that you can proceed to file your motions without the Binding Term Sheet, the Hobbit Binding Term Sheet and the Regrant Agreement. Zaentz will not argue that they were untimely filed.

Regards,
Sean

From: Cestero, Ricardo [mailto:rcestero@greenbergglusker.com]
Sent: Thursday, March 28, 2013 4:58 PM
To: Lens, Molly
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.; Callagy, Sean M.; Ulin, John C.; Glick, Martin R.; Jih, Victor
Subject: RE: Today's filings

Molly-

First, you and Victor do not have the authority to require that documents be filed under seal. Only the Court has that authority. And, the Court will only make such orders if a party makes an appropriate motion. The party who believes such an order is necessary or appropriate has the obligation to bring that motion.

Second, there is a difference between a protective order, which we agree should be entered, and an order allowing documents to be filed under seal, which we do not agree should be entered. We have never agreed to file anything under seal, nor do we believe such an order is warranted. Once the documents have been redacted to remove financial terms, Plaintiffs see nothing in any of these agreements that would justify a sealing order and do not believe a motion to file them under seal would be proper. Therefore, Plaintiffs cannot and will not make a motion to have the documents

filed under seal. If either Warner or Zaentz believes it can make a reasonable argument for why these documents should be sealed, it is free to do so.

Third, your suggestion that the 1969 Agreements, Schedules D, the various amendments thereto and the Zaentz assignment are confidential and subject to redaction is entirely without merit. All of these documents, with the possible exception of the 1975 Amendment and the 1981 Amendment were publicly filed in various proceedings in the Lord of the Rings litigation. They are therefore part of the public record and, by definition, not confidential. Further, none of these agreements contain confidentiality provisions and none contains any confidential information. Accordingly, we do not agree that they should be redacted.

Fourth, we are happy to use your redacted versions of the Hobbit Binding Term Sheet and the Regrant Agreement. However, you did not send us a redacted copy of the Binding Term Sheet. What is tilted the original Binding Term Sheet is actually another copy of the Hobbit Binding Term Sheet.

Finally, while I would like to pursue a compromise solution to these issues, we cannot do so unless we are certain that it will not prejudice Plaintiffs' position. In that regard, I appreciate that you have "confirmed" that your client will not argue that our exhibits were filed late or claim any prejudice therefrom, but you do not represent Zaentz and therefore cannot make that "confirmation" for them. Unless we receive written confirmation from someone on the Zaentz team **in the next 15 minutes** that they agree that we can file our motions without the Binding Term Sheet, the Hobbit Binding Term Sheet and the Regrant Agreement while we continue to try and find a solution, we will have to proceed with our filing.

Regards,
Ricardo

From: Lens, Molly [<mailto:mlens@omm.com>]
Sent: Thursday, March 28, 2013 4:11 PM
To: Cestero, Ricardo
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.; Sean.Callagy@aporter.com; John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Jih, Victor
Subject: RE: Today's filings

Ricardo -

Your recitation of the record is incomplete and inaccurate. When we met and conferred with you on March 1 about this issue, we specifically advised you that the documents would have to be filed under seal and redacted. You responded by confirming that you "understood our client's sensitivity." Indeed, it was during this conversation that we first discussed the need to enter into a protective order in this case and you agreed to circulate the protective order used in the previous litigation (which you did two weeks later). Accordingly, we strongly disagree with your attempt to characterize this as "our problem."

With respect to the three conditions that you seek to impose, it is not Warner's or Zaentz's obligation to file a motion for a protective order. Warner and Zaentz do not agree to do so on an ex parte basis or otherwise. Moreover, as you stated during our March 1 meet and confer, the issue of confidentiality is going to keep arising in this case. The parties should be able to finalize a protective order shortly, which will resolve this issue, rendering item number 2 moot. Finally, I can confirm that Warner and Zaentz agree not to argue that your exhibits were filed late or claim any prejudice therefrom.

Finally, to be clear, it is also Warner's and Zaentz's position that the earlier agreements must also be filed under seal with their financial terms redacted. To that end, I have attached below the redacted versions of the list of agreements in your email of March 26. Please note that we have not redacted the 1975 amendment.

Thanks,

Molly

Molly M. Lens
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mlens@omm.com

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From: Cestero, Ricardo [<mailto:rcestero@greenbergglusker.com>]
Sent: Thursday, March 28, 2013 1:57 PM
To: Lens, Molly
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.; Sean.Callagy@aporter.com; John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Jih, Victor
Subject: RE: Today's filings

Molly-

We are aware of the confidentiality provisions and are complying with them in all respects. Your clients have placed these agreements at issue and Plaintiffs are fully entitled to present them to the Court.

Moreover, the remainder of your email is inaccurate and disingenuous in a number of respects. First, I raised this issue in writing five weeks ago, giving you and your clients ample opportunity to address any concerns you and they may have. You chose not to address the matter in a timely manner. Second, two weeks ago, I emailed you a copy of the protective order that was used in the Lord of the Rings litigation and proposed that we enter into a similar protective order in this case. You have not responded at all to that email. Therefore, at this point, nothing is being negotiated because you have not indicated your position on the protective order at all. Third, since your client is the one who wants the documents filed under seal, by definition it was your obligation to make the necessary motion, not ours. That is why I raised the issue five weeks ago – to give you and your client time to make whatever motions you deemed appropriate. It is not our fault that you did not do so.

However, even though this is a problem of your creation, we would consider following your suggestion of not including the Binding Term Sheet, the Hobbit Binding Term Sheet or the 2010 Regrant Agreement in today's filing provided that Zaentz and the Warner Parties each agree, in writing, to the following three conditions:

- (1) that one or both of Zaentz and the Warner Parties will immediately file an ex parte, emergency request for an order allowing these exhibits to be filed under seal and that all of Plaintiffs' rights with respect to any such application are reserved;
- (2) that, should the Court not rule on the application to file these documents under seal by the date Plaintiff's Reply Briefs are due (April 29, 2013), Plaintiffs will be permitted to file unsealed redacted versions of the agreements in connection with their reply papers to ensure that the Court has the exhibits in order to prepare for the hearing; and
- (3) that the failure to file these three exhibits at the time our moving papers were filed will not prejudice our motions in any way and Zaentz and the Warner Parties will not object to, or argue that they were prejudiced in any way by, the late filing of these exhibits.

Please let me know how you would like to proceed.

Regards,

Ricardo

From: Lens, Molly [<mailto:mlens@omm.com>]
Sent: Thursday, March 28, 2013 12:42 PM
To: Cestero, Ricardo
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.; Callagy, Sean M. (Sean.Callagy@aporter.com); John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Jih, Victor
Subject: RE: Today's filings

Ricardo -

Several of the agreements that you are proposing to publically file contain specifically negotiated confidentiality provisions. It is your obligation, not ours, to comply with those terms. You cannot avoid those obligations by unilaterally shifting to us a purported obligation to file a motion for a protective order for the documents that you wish to file. To the extent that you publically file these documents, regardless of whether certain terms are redacted, you will be in breach of those provisions. Warner and Zaentz accordingly reserve all rights.

The parties have agreed that a protective order is appropriate in this case. Because the terms of that protective order are still being negotiated, we propose that you file your motions today, minus the exhibits listed in your email below, along with a motion to file the agreements under seal. Your substantive motions could then be supplemented once the order to file under seal has been issued. Of course, Warner and Zaentz waive any objection to having the exhibits be filed at a later date.

We are finalizing the redactions now and will have them to you shortly.

Thanks,

Molly

Molly M. Lens
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From: Cestero, Ricardo [<mailto:rcestero@greenbergglusker.com>]
Sent: Thursday, March 28, 2013 11:14 AM
To: Lens, Molly; John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Jih, Victor
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.
Subject: RE: Today's filings

Molly-

We will review your comments on the Rule 26(f) report. Attached is our version which includes our statement of the case.

With respect to the exhibits to be attached to our motions, as I'm sure you are aware, a party is not permitted to file anything under seal without a prior court order. See local rule 79-5. We do not even have a protective order in the case, let alone an order permitting documents to be filed under seal. To the extent the WB parties believed a sealing order was appropriate, it was your obligation to obtain that order. Therefore, we will not be filing anything under seal today, however, we will consider your redactions if we receive them timely. I must note that you have had a full month to address this issue. We do not believe it is reasonable that you have waited until the very day the documents are due to be filed to address the issue.

Regards,
Ricardo

From: Lens, Molly [<mailto:mlens@omm.com>]
Sent: Thursday, March 28, 2013 10:43 AM
To: Cestero, Ricardo; John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Jih, Victor
Cc: Petrocelli, Daniel; Moriarty, Elisabeth; Eskenazi, Bonnie; Primack, Nikolas A.
Subject: RE: Today's filings

Ricardo -

Per my previous email, you should have received our revisions to the Rule 26(f) joint report. We look forward to your comments and receiving your outstanding section of the document.

With respect to your request to attach confidential documents to your motions, we expect to provide you with the necessary redactions shortly. Please note that the redacted documents will also need to be filed under seal.

Thanks,

Molly

Molly M. Lens
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From: Cestero, Ricardo [<mailto:rcestero@greenbergglusker.com>]
Sent: Thursday, March 28, 2013 10:32 AM
To: John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Lens, Molly; Jih, Victor
Cc: Petrocelli, Daniel; EMoriarty@greenbergglusker.com; beskenazi@greenbergglusker.com
Subject: Today's filings

Counsel-

We have yet to receive any input from you on the joint report. Please immediately provide your comments so that we can make any necessary changes and have it prepared for filings.

In addition, we have still not received any proposed redactions on the agreements from WB counsel. Our intention is to redact the monetary terms only from the Binding Term Sheet, the Hobbit Binding Term Sheet and the Regrant Agreement. Unless we receive something from you this morning, we will proceed in that manner.

Regards,
Ricardo

Ricardo P. Cestero | Attorney at Law | [Biography](#)
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EXHIBIT 2

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& MACHTINGER LLP
1900 Avenue of the Stars, 21st Floor
Los Angeles, California 90067-4590

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FOURTH AGE LIMITED, a United Kingdom corporation; PRISCILLA MARY ANNE REUEL TOLKIEN, as TRUSTEE OF THE TOLKIEN TRUST, a United Kingdom Charitable Trust; THE J.R.R. TOLKIEN ESTATE LIMITED, a United Kingdom corporation; HARPERCOLLINS PUBLISHERS, LTD., a United Kingdom corporation; UNWIN HYMAN LTD., a United Kingdom corporation; and GEORGE ALLEN & UNWIN (PUBLISHERS) LTD., a United Kingdom corporation,

Plaintiffs,

v.

WARNER BROS. DIGITAL DISTRIBUTION, INC., a division of WARNER BROS. HOME ENTERTAINMENT, INC., a Delaware corporation; WARNER BROS. ENTERTAINMENT, INC., a Delaware corporation, as successor-in-interest to New Line Cinema Corp.; WARNER BROS. CONSUMER PRODUCTS, INC., a Delaware corporation; WARNER BROS. INTERACTIVE ENTERTAINMENT, INC., a division of WARNER BROS. HOME ENTERTAINMENT, INC.; NEW LINE PRODUCTIONS, INC., a California corporation; THE SAUL ZAENTZ COMPANY d/b/a Middle-earth Enterprises, a Delaware corporation; and DOES 1-10, inclusive,

Defendants.

AND RELATED COUNTERCLAIMS.

Case No. CV 12-09912
ABC (SHx)

Hon. Audrey B. Collins

**PLAINTIFFS'
STATEMENT OF
NON-OPPOSITION
TO THE *EX PARTE*
APPLICATION TO
HAVE EXHIBIT 1 TO
THE DECLARATION
OF RICARDO P.
CESTERO FILED
UNDER SEAL**

Plaintiffs Fourth Age Limited, Priscilla Mary Anne Reuel Tolkien, as Trustee of the Tolkien Trust, The J.R.R. Tolkien Estate Ltd., Harper Collins Publishers, Ltd., Unwin Hyman Ltd. and George Allen & Unwin (Publishers), Ltd. (collectively, the “Plaintiffs”) do not oppose the *Ex Parte* Application to Have Exhibit 1 to the Supplemental Declaration of Ricardo P. Cestero Filed Under Seal (the “Application”) filed by defendants Warner Bros. Home Entertainment Inc., Warner Bros. Entertainment Inc., Warner Bros. Consumer Products, Inc. and New Line Productions, Inc. (collectively, the “Warner Parties”). However, in light of many of the assertions made by the Warner Parties in the Application, Plaintiffs feel compelled to file a brief response.

1. Plaintiffs Attempted to Preserve Confidentiality by Redacting the Financial Terms in Exhibit 1. Exhibit 1 is a settlement agreement between the Warner Parties and Microgaming Systems, Ltd. (“Microgaming”). The Warner Parties alleged that they terminated their license agreement with Microgaming in paragraph 36 of their publicly-filed First Amended Counterclaims. The Warner Parties then publicly filed the Declaration of Monica Kim, which explicitly states that they had entered into settlement agreements with Microgaming and describes the material terms of those agreements, without disclosing the financial terms. (Kim Decl., ¶ 7). Plaintiffs therefore reasonably believed that, after the public filing of the First Amended Counterclaim and the Declaration of Monica Kim, the only material terms of the Microgaming settlement agreement that remained confidential were the financial terms, which Plaintiffs redacted. Accordingly, Plaintiffs acted reasonably to protect the Warner Parties’ confidential information.

2. The Warner Parties Have Unreasonably Delayed the Entry of an Appropriate Protective Order. Plaintiffs provided the Warner Parties with a proposed protective order on March 14, 2013. That proposed protective order had been accepted by at least one of the Warner Parties (New Line Cinema) in a prior litigation between the parties. Yet, the Warner Parties did not respond to the

1 proposed protective order for six weeks. In fact, even after a dispute arose between
2 the parties about the filing of exhibits in connection with Plaintiffs' moving papers,
3 the Warner Parties did not respond regarding the proposed protective order. The
4 Warner Parties' lack of diligence regarding the entry of a protective order belies
5 their assertions about the highly sensitive nature of the documents they produced.

6 Moreover, the Warner Parties do not accurately describe the provisions of the
7 protective order proposed by Plaintiffs. That protective order adopted a procedure
8 set forth in California Rules of Court 2.550 and 2.551, which allows a party to file
9 documents provisionally under seal even without a court order and then creates a
10 mechanism pursuant to which other parties can seek an order permanently sealing
11 the document. No such provisions exist in the federal rules. In fact, the federal
12 rules are to the contrary; under Central District Local Rule 79-5, no document may
13 be filed under seal without a prior court order. Accordingly, absent a special Court
14 order, the concept of provisionally filing under seal has no place in federal court.

15 Plaintiffs have consistently maintained that it is not their obligation to seek
16 orders requiring documents on which the Warner Parties rely for their claims to be
17 filed under seal. Indeed, Plaintiffs have no obligation to preserve the
18 confidentiality of documents to which they are not parties. Moreover, Plaintiffs
19 have no basis for asserting, much less establishing, that a document to which they
20 are not a party contains confidential information that should be sealed.
21 Accordingly, to the extent the Warner Parties want particular documents filed under
22 seal, it is their obligation to make the necessary application.

23 **3. *Plaintiffs Reserve Their Right to Oppose Future Applications to Seal***
24 ***Documents and Reserve all of their Rights with Respect to the Future Uses of***
25 ***Exhibit 1.*** The present Application and the Warner Parties' conduct with respect to
26 the filing of exhibits in support of Plaintiffs' anti-SLAPP Motion makes clear that
27 the Warner Parties intend to restrict the public's access to the facts of this case as
28 much as possible. While Plaintiffs do not oppose the present Application, Plaintiffs

1 want to be clear that they are not waiving their rights to have documents stamped as
2 confidential filed publicly during the course of this case. Plaintiffs believe any
3 party who wants to have documents filed or used under seal must satisfy the
4 relevant standards that have been set forth in the relevant statutory and case law.
5 Plaintiffs reserve their rights to oppose any future request to seal documents in this
6 case and do not concede that Exhibit 1 or any other document stamped confidential
7 in this case contains sufficiently sensitive information that it cannot be placed in the
8 public file or presented in open court.

9 In light of the foregoing, Plaintiffs do not oppose the Warner Parties
10 Application to file Exhibit 1 under seal, but reserve all future rights with respect to
11 the sealing of documents in this case, including Exhibit 1.

12
13 DATED: May 2, 2013

GREENBERG GLUSKER FIELDS
CLAMAN & MACHTINGER LLP

14
15
16 By: /s/ Bonnie E. Eskenazi
BONNIE E. ESKENAZI (SBN 119401)

EXHIBIT 3

Lens, Molly

From: Cestero, Ricardo <rcester@greenbergglusker.com>
Sent: Friday, May 03, 2013 2:12 PM
To: Lens, Molly
Cc: Eskenazi, Bonnie; Moriarty, Elisabeth; Valadez, Rachel; John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Petrocelli, Daniel; Jih, Victor; Primack, Nikolas A.; Sean.Callagy@aporter.com
Subject: RE: Fourth Age v. Warner Bros.

Molly-

We have had a chance to review your changes to the protective order. Most of your changes are acceptable. There are, however, three provisions with which we cannot agree. Rather than sending you a redline, I will raise the issues here so we can discuss them in concept and hopefully come to some agreement.

Paragraph III.E.

You have asked for all depositions to be marked confidential in their entirety, regardless of the content of the deposition. This provision is overly broad and would subject plainly non-confidential testimony to the protective order provisions. The order from the previous case required that parties identify specific portions of the transcripts to be designated confidential either on the record or within a specified time thereafter. That provision allows the parties to protect actually any testimony that actually relates to confidential information without subjecting non-confidential testimony to the protective order. If there are specific modifications to the language used in the prior case that you would like to make, we are open to those suggestions. However, a blanket protection for all deposition testimony is not acceptable.

Paragraph IV.D

You have modified the list of parties who may see confidential information in such a way that the parties and their employees (other than in-house counsel) will have to sign the attachment agreeing to be bound to the protective order before any documents can be shown. It's not clear whether you made this change intentionally or what the purpose behind that is. The parties (and their employees) will already be bound by the protective order once it's entered by the Court. Requiring each employee or representative of a party to separately sign the acknowledgement will create a logistical problem, particularly for the institutional parties. I have never seen a protective order that requires parties and their employees to sign the acknowledgement, nor should it be necessary. Perhaps you can explain your thinking on this point.

Paragraph V.A

You have included a provision requiring any party seeking to file confidential information with the Court to file it under seal, even though I have previously told you we would not agree to that. Notably, the prior order references the California Rules of Court, which contain a specified procedure whereby a party can file "provisionally under seal," but imposes the obligation on the party that wants the document to be sealed to actually file the motion for the sealing order. The federal rules do not contain a similar provision. As an alternative to that procedure, we are happy to include a provision which requires a party seeking to file confidential information to give all parties 5 days' notice prior to such filing to allow for an application to file under seal to be filed by any other party. Of course, this would not prevent any party from itself filing a request to file certain documents under seal in connection with its own filings. However, the burden of making the motion to file under seal should rest with the party that wants the document (or documents) filed under seal.

Please feel free to give me a call to discuss any or all of these points.

Regards,
Ricardo

From: Lens, Molly [mailto:mlens@omm.com]
Sent: Tuesday, April 30, 2013 4:34 PM
To: Cestero, Ricardo
Cc: Eskenazi, Bonnie; Moriarty, Elisabeth; Valadez, Rachel; John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Petrocelli, Daniel; Jih, Victor; Primack, Nikolas A.; Callagy, Sean M. (Sean.Callagy@aporter.com)
Subject: RE: Fourth Age v. Warner Bros.

Ricardo -

Attached please find Warner's and Zaentz's combined comments to the proposed protective order. I have also attached a redline for your convenience. You will note that the majority of the changes were made simply to tailor the protective order to this case, such as updating the parties' names and replacing the state court rule references with the federal rules. Given the issues that the parties have had recently with confidential documents, we would like to finalize the protective order promptly and present it for the Court's approval so as not to delay document discovery.

Thanks,

Molly

Molly M. Lens
O'Melveny & Myers LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Phone: (310) 246-8593
Fax: (310) 246-6779
mlens@omm.com

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Sent: Thursday, March 14, 2013 10:43 AM
To: John.Ulin@APORTER.COM; Marty.Glick@aporter.com; Lens, Molly; Petrocelli, Daniel; Jih, Victor
Cc: beskenazi@greenbergglusker.com; EMoriarty@greenbergglusker.com; rvaladez@greenbergglusker.com
Subject: Fourth Age v. Warner Bros.

Counsel-

Attached is the protective order that was used in the LOTR accounting case. Obviously, this was previously agreed to by the Plaintiffs and the Warner side. Plaintiffs would be agreeable to having a similar order entered in this case.

Best regards,
Ricardo

Ricardo P. Cestero | Attorney at Law | Biography
D: 310.785.6809 | F: 310.201.2309 | RCestero@greenbergglusker.com

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What is the AGM (and Springmoot)?

The AGM (**Annual General Meeting**) takes place in the month of April every year, and is the formal business meeting of the Society where committee members are elected and the running of the Society is discussed. This is followed in the evening by a semi-formal **Annual Dinner** followed by a talk from a Guest Speaker, often a Tolkien scholar, publisher or artist. Past guest speakers have included Tom Shippey, Priscilla Tolkien, Michael Tolkien, Brian Sibley, Rayner Unwin and Ted Nasmith.

What happens over the weekend?

The AGM itself only takes up a few hours of a Saturday afternoon but, given the time it takes to get there, it is usually a **weekend event** for members. Beginning with an Innmoot (eating, drinking and chatting) on the Friday evening followed by a tour of the local town (or an organised trip) on the Saturday morning. On the Saturday evening there is our Annual Dinner with the a talk from a Guest Speaker.

On Sunday there is often an organised tour of the town or a local heritage site, especially if it has Tolkienian connection or theme. **From 2015, the AGM weekend will also be known as 'Springmoot' to emphasise the fact that it's a social gathering and event rather than simply a business meeting.** The AGM takes place in a different location each year and the organising of the event is usually the result of the work an individual member or smial local to the AGM venue.

Previous AGMs

Year	Location	Guest Speaker(s)	Talk Published?
2015	Norfolk Arms, Arundel	<u>TBC</u>	
2014	Baskerville Hall Hotel, Hay-on-Wye	John Garth	
2013	Comfort Hotel, <u>St Albans</u>	Lynn Whitaker and members	
2012	School of Education, University of Glasgow	Farah Mendlesohn	
2011	The White Hart Royal Hotel, Moreton-in-Marsh	Dimitra Fimi	
2010	Jury's Inn Hotel, Brighton	Charles Noad	<i>Mallorn</i> 50
2009	<u>St Aidan's</u> College, Durham	Allan Turner	
2008	Leofric Hotel, Coventry	Edmund Weiner	
2007	The Astor Hotel, Plymouth	Roger (& Linda) Garland	Slideshow and <u>Q&A</u>
2006	The King's School, Canterbury	Henry Gee	
2005	The Mayflower Theatre and Southampton Park Hotel	Brian Rosebury	

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2004	White Hart Hotel, Lincoln	John Garth	
2003	Blossoms Hotel, Chester	Ted Nasmith	
2002	Moreton Park Lodge, Oswestry	Brian Sibley	
2001	Wortley Hall, Sheffield	Christopher Garbowski	
2000	New Inn, Gloucester	Patrick Curry	<i>DPGT Volume 3</i>
1999	King Charles Hotel, Gillingham	Michael Scott Rohan	<i>DPGT Volume 3</i>
1998	Plough and Harrow Hotel, Birmingham	Michael George Tolkien	<i>DPGT Volume 3</i>
1997	Old Course Hotel, Chepstow	Colin Duriez	<i>DPGT Volume 2</i>
1996	Lord Leycester Hotel, Warwick	René van Rossenberg	<i>DPGT Volume 2</i>
1995	Cairn Hotel, Edinburgh	Charles Coulombe	<i>DPGT Volume 3</i>
1994	The Lion Hotel, Shrewsbury	Joanna Tolkien	<i>DPGT Volume 2</i>
1993	The Moat House Hotel, Nottingham	Mary Butler	
1992	The Waterfront Hotel, Hull	Colin Duriez	<i>DPGT Volume 2</i>
1991	Maids Head Hotel, Norwich	Tom Shippey	<i>DPGT Volume 2</i>
1990	Corpus Christi College, Cambridge	Rayner Unwin	<i>DPGT Volume 2</i>
1989	Ship Hotel, Chichester	A.N. Wilson	
1988	Park Hotel, Cardiff	Graham Watkins	
1987	Queen's Hotel, Leeds	Rob Inglis	
1986	Queen's Hotel, Cheltenham	Geraldine Harris	<i>DPGT Volume 1</i>
1985	St George Hotel, Liverpool	Douglas Gray	
1984	The Guildhall Hotel, Leicester	Jonathan Simons	
1983	YMCA, Cambridge	Tom Shippey	<i>DPGT Volume 1</i>
1982	The County Hotel, Canterbury	Robert Giddings	
1981	Annesley Hotel, Lincoln	Brian Sibley Barbara Strachey	
1980	Royal Station Hotel, York	Tom Shippey	<i>DPGT Volume 1</i>
1979	Westmoreland Hotel, London	John Ezard David Fielder	
1978	Grand Hotel, Birmingham	Rayner Unwin Tom Shippey	
1977	Grosvenor Hotel, Chester	Michael Tolkien	
1976	Hampstead Town Hall, London	Priscilla Tolkien Humphrey Carpenter	
1975	Bloomsbury Centre Hotel, London	Priscilla Tolkien	
1974	Ivanhoe Hotel, London	Rayner Unwin Austin Olney	
1973	Sherlock Holmes Hotel, London	Joy Chant	
1972	Home of Keith Bridges, Welwyn Garden City	No Speaker	

Map of previous AGMs

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~Nazgûl~

"In their white faces burned keen and merciless eyes; under their mantles were long grey robes; upon their grey hairs were helms of silver; in their haggard hands were swords of steel."

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J.R.R. Tolkien Biography

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Priscilla Mary Reuel Tolkien

Priscilla (Prisca to her father) was born in 1929 in Oxford, and provided Edith and Tolkien with a greatly longed-for daughter.



She studied for her degree in Lady Margaret Hall, and then after that, in 1955, she accompanied Tolkien on a tour around Italy, visiting Venice and Assisi. After that, she started living on the other side of the city from her parents, but still saw them frequently. She worked both as a probation officer and a social worker in Oxford.

She took a particular interest in her father's art, writing an article entitled "My Father the Artist" for 'Amon Hen', the bulletin of The Tolkien Society, and contributing an article in a similar vein to a yet unpublished volume of reminiscences about Tolkien.

Priscilla, in an understated way, has come to represent Tolkien to many fans, especially in the UK. She attends the Tolkien Society's Oxonmoots each year, is their Honorary Vice-President, and hosts a reception for the fans. This year, she launched the Royal Mail's Tolkien stamp edition. And, together with her brother John, she created the Tolkien Family Album – a book full of photographs and reminiscences about the family. In 1992, she travelled to Bloemfontein where she unveiled a plaque commemorating the 100th anniversary of Tolkien's birth at the Anglican Cathedral, and she since visited South Africa two more times.

She is a patron of the Find Your Feet charity, and lives in Oxford.

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Priscilla Tolkien visits Exeter

Wed, 30/01/2008



Written by Guy Pewsey (<mailto:guy.pewsey@exeter.ox.ac.uk>)

J.R.R. Tolkien is one of the most widely read authors of the twentieth century, famous for his Middle Earth-based novels as well as his respected academic career. This great man's life is inextricably linked with Oxford, and particularly with Exeter, the undergraduate college which he always looked back on so fondly. It is for this reason that Exeter was lucky enough to host an evening with Priscilla Tolkien, youngest daughter of the late writer, providing an opportunity to discover the more personal aspects of her father's life and, in turn, how her own life has been affected by the attention brought about by the enormous success of novels such as 'The Lord of the Rings'.

The many Exonians in attendance found great pleasure in Ms. Tolkien's recollections of her father, including childhood memories of his almost childlike enthusiasm for life; it seems as though he saw college loyalty as vital, suggested by his narrow escape from a tunnel with the police after an egg aimed at Jesus College missed its target, instead finding the head of a bobby on the beat. Parts of his time at Oxford however were tinged with tragedy as, according to Priscilla, the outbreak of war which led to mass conscription separated her father from many of his friends and peers.

While it was indeed a great pleasure to hear about the author's time at Oxford from such a reliable source, Ms. Tolkien's musings concerning her own life was equally compelling. She spoke enthusiastically of her enjoyment of the famous Christmas letters sent to her as a child by her father, and described her fondness for the books which made him famous, citing its timelessness and intensity of emotions as the reasons for its success. Priscilla also revealed her fondness for the bust of her father on display in the chapel, and certainly seemed pleased that her father's old college is still home to so many of his fans. Ms. Tolkien was a lively speaker with a sunny disposition and a fondness for a good cup of tea, and all present found her talk both stimulating and informative, revealing the human side to the famous name.

Photo by Kitty Jansz.

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The 50th Anniversary celebration of the publication of The Lord of the Rings

Held in August of 2005 in Birmingham, England



Five years in the planning and five days in the passing it's over, but it was fun while it lasted! As the organizing committee and other volunteers catch up on their sleep there is much to look back on. The event began with a civic reception as Birmingham's Lord Mayor welcomed the conference and participating societies to Birmingham and it ended with a standing ovation. Tolkien 2005: The Ring Goes Ever On was a 5 day conference marking the 50th anniversary of the complete publication of JRR Tolkien's The Lord of the Rings, and the largest gathering of fans and academics from around the world.

Over 750 people gathered in Aston University, Birmingham, England to give or attend papers, lectures, panels, workshops, see 2D and 3D art inspired by The Lord of the Rings, watch plays and skits based (loosely at times) on Tolkien's works, queue for autographs and stay up late at parties.

Neither strikes at airports, costumed-obsessed media, nor pubs running out of beer (and food) stopped them enjoying themselves "The Tolkien Society had no sleep, the Tolkien Society needs no sleep!"

Guests Present included renowned academics, artists and authors: Rhona Beare, Julian Bradfield, Patrick Curry, Colin Duriez, Anke Eißmann, Verlyn Flieger, Christopher Garbowski, John Garth, Tim Kirk, Alan Lee, Ted Nasmith, Michael Scott Rohan, Tom Shippey, Priscilla Tolkien, and Viv Wilkes. Event highlights included: Alan Lee signing his brand new "The Lord of the Rings Sketchbook" A world exclusive reading from a new book on one of Tolkien's shorter works "Smith of Wootton Major" by American academic Verlyn Flieger "Farmer Giles of Ham" staged by Birmingham's own Shire Productions. Cambridge Tolkien Society's version of Brian Sibley's adaptation of The Lord of the Rings Art Show with displays from Alan Lee, Ted Nasmith, Anke Eissman, Tim Kirk and a host of others. The Dealers Room that busily helped people add to their collections of Tolkien's works, rare books, games artwork and CDs

Old friendships were renewed and new ones kindled between people from around the globe. Partner Societies: The Tolkien Society; The Mythopoeic Society (USA); Elanor (Belgium); Deutsche Tolkien Gesellschaft (Germany); Arthedain (Norway); Sociedad Tolkieni de México (Mexico); Sociedade de Tolkien Brasileira (Brazil); Società Tolkieniana Svizzera & Eldalië (Switzerland); Sociedad Tolkien Española (Spain); The Polish Tolkien Society; Forodrim (Stockholm, Sweden); The Greek Tolkien Society; Skies of Rohan (Idaho & Montana, USA); Proudneck (Italy); Keskmaa Ordu (Estonia); Unquendor (Netherlands); Tol Harndor (Australia); Magyar Tolkien Társaság (Hungary); Conselho Branco Sociedade Tolkien (Brazil); The Cambridge Tolkien Society (UK); The Charles Williams Society; Heren Istarion (New York, USA); Taruithorn: the Oxford Tolkien Society (UK); Österreichischen Tolkien Gesellschaft (Austria); The George MacDonald Society; Beyond Bree (MENSA, USA); Società Tolkieniana Italiana (Italy); Walking Tree Publishers.

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Royal Mail launches Rings stamps

Royal Mail is celebrating the 50th anniversary of the publication of *The Lord of the Rings* with a special issue.

The 10 illustrations relate to places and characters from JRR Tolkien's book and - with one exception - were taken from the author's original drawings.

"The images offer a rare glimpse of how the author imagined the places he created," said Mike Dalton, head of external relations at Royal Mail.



The stamps are based on JRR Tolkien's original drawings

The illustrations are rarely reproduced or seen by the public.

The first two parts of *The Lord of the Rings*, *The Fellowship of the Ring* and *The Two Towers*, were published in 1954. The third, *The Return of the King*, followed in 1955.

The stamp illustrations are as follows:

- **Map from the Lord of The Rings** Drawn by Christopher Tolkien, the map depicts areas from Middle-earth.
- **The Forest of Lothlorien** The name given to the land to the east of Misty Mountains (usually called Lorien).
- **The Fellowship of the Ring** The title of part one; the quest to take the One Ring to Mount Doom to destroy it.
- **Rivendell** Hidden refuge of Elrond Halfelven, founded in the 2nd Age against the assaults of Sauron in Eriador.
- **The Hall at Bag-End** Where Bilbo Baggins lived, named after a Worcestershire lane where Tolkien's aunt lived.
- **Orthanc** Granted by Beren to the Wizard Saruman. The Tower played an important part in the War of the Ring.
- **Doors of Durin** The enchanted doors could be opened by a single word, *mellon* - Elvish for friend.

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- **Barad-Dur** The dark tower of Barad-Dur was constructed by Sauron, using the power of the One Ring.
- **Minas Tirith** The seven-tiered citadel of the Kings of Gondor, originally named Minas Anor.
- **Fanghorn Forest** The forest took its names from the Elvish word Fanghorn or Treebeard.

The stamps were launched on Wednesday by the author's daughter, Miss Priscilla Tolkien, at the Bodleian Library in Oxford.

"I am delighted that Royal Mail have chosen to honour my father's work with this stamp issue," she said.

"They have done a splendid job in reproducing his original artwork on the stamps, giving many people the first opportunity to view scenes from The Lord of the Rings as he imagined them himself."

The 10 first class stamps go on sale from Thursday.

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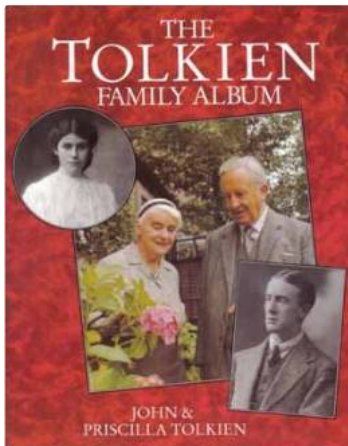
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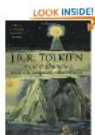
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Beowulf: A Translation and Commentary
J.R.R. Tolkien

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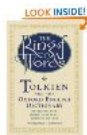
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Exhibit 4

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The Inklings Archives - recordings of talks relating to the Inklings (21.01.08 by Pieter Collier) - 0 Comments

The Inklings Archives are recordings of talks given at Church House, Westminster between 1977-1983, relating to the group of writers who formed the 'Inklings': C S Lewis, J R R Tolkien, Charles Williams, and other writers who influenced them, including George MacDonald. The meetings were organised by Nigel Sustins, then Manager of Church House Bookshop, who made the recordings. Each CD is 70-75 minutes in length and cost 15 GBP.

The recordings, originally on tape, have been converted to digital format and transferred to CD. Any deficiency is more than made up for by the unique and historic nature of the material.

The 'Archives' are being produced in a limited edition of 100 sets, each CD authenticated by a specific photograph which bears the number of the copy, initialled by Nigel Sustins.

INKLINGS ARCHIVES 1: FACETS OF LEWIS

'Facets of Lewis' was held on 2nd March 1977, to mark the publication of "The Dark Tower and Other Stories".

Speakers are:

[Track 1] Walter Hooper, Lewis's co-literary trustee and editor.

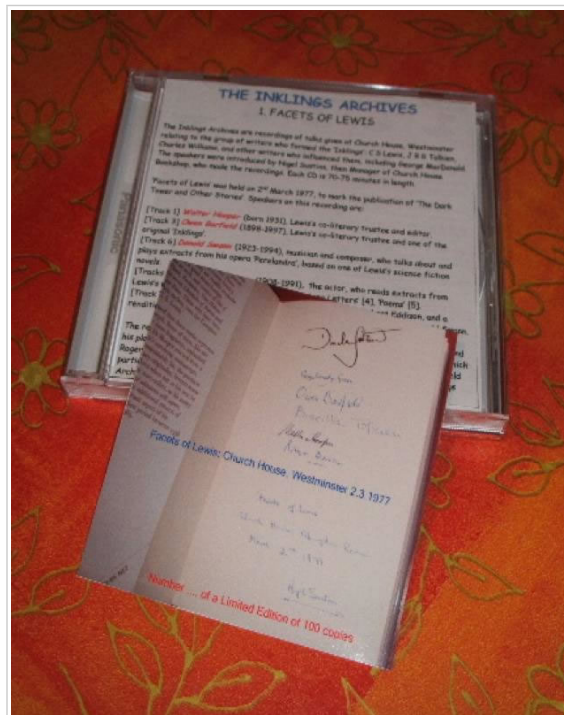
[Track 3] Owen Barfield, Lewis's co-literary trustee and one of the original "Inklings".

[Track 6] Donald Swann, musician and composer, who talks about and plays extracts from his opera 'Perelandra', based on one of Lewis's science fiction novels.

[Tracks 2,4,5] Robert Eddison, the actor, who reads extracts from Lewis's writings: 'The Dark Tower' [2], "Screwtape Letters" [4], 'Poems' [5].

[Track 7] A Finale or Epilogue, with further readings from Robert Eddison, and a rendition of Tolkien's 'Bilbo's Last Song', set to music and performed by Donald Swann.

Authenticated by a photograph of the signatures in a copy of 'The Dark Tower' (Walter Hooper, Owen Barfield, Priscilla Tolkien, Roger Lancelyn Green, Donald Swann, Robert Eddison, all of whom were present at the event).



INKLINGS ARCHIVES 2: FACETS OF TOLKIEN

'Facets of Tolkien' was held on 16th September 1977, to mark the publication of 'The Silmarillion'.

Speakers are:

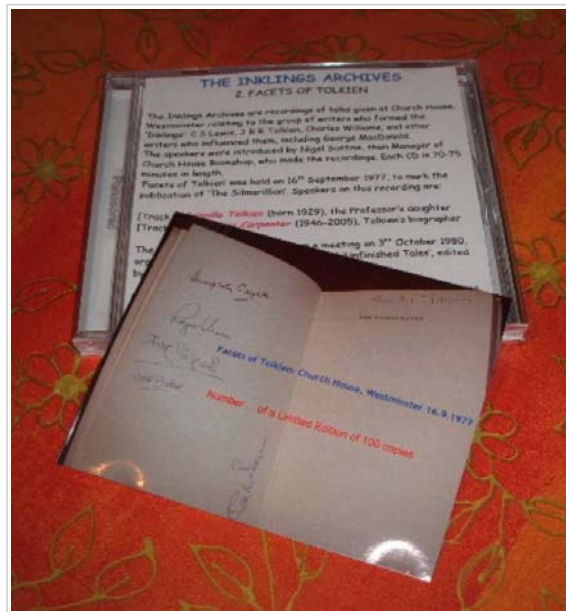
[Track 1] Priscilla Tolkien, the Professor's daughter

[Track 2] Humphrey Carpenter, Tolkien's biographer. The other two recordings are from a meeting on 3rd October 1980, organised to celebrate the publication of 'Unfinished Tales', edited by Tolkien's son Christopher, and consist of :

[Track 3] Rayner Unwin, Tolkien's publisher discussing future plans to issue new Tolkien material

[Track 4] Rayner Unwin, answering questions.

Authenticated by a photograph of the signatures in a copy of 'The Silmarillion' (Priscilla Tolkien, Humphrey Carpenter, Rayner Unwin, two of Tolkien's granddaughters and Pauline Baynes, the artist, all of whom were present at the event).



INKLINGS ARCHIVES 3: CHARLES WILLIAMS AND OTHER INKLINGS

'The Inklings' was held on 20th October 1978, to mark the publication of Humphrey Carpenter's book of that title.

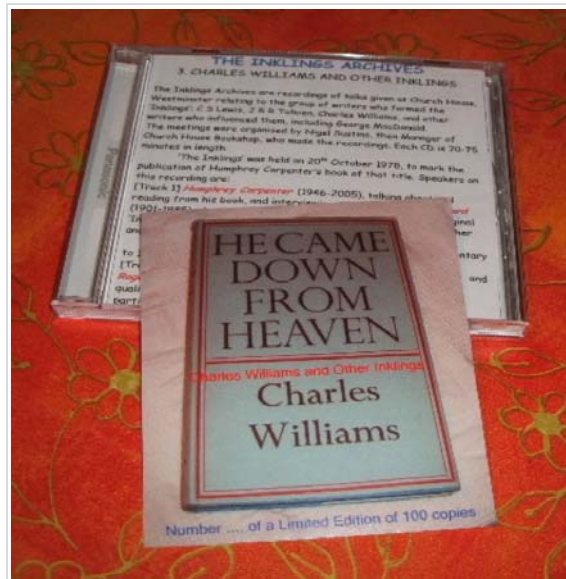
Speakers are:

[Track 1] Humphrey Carpenter, talking about and reading from his book, and interviewing R E ('Humphrey') Havard, physician to Lewis and Tolkien, and one of the original 'Inklings'.

[Track 2] Alice Mary Hadfield, biographer and friend of Charles Williams, talking about his life and work. The other recording is from 'Facets of Lewis' (supplementary to Inklings Archive 1), held on 2nd March 1977:

[Track 3] Question Time with Walter Hooper, Owen Barfield, and Roger Lancelyn Green (Lewis's co-biographer).

Authenticated by a photograph of the book 'He Came Down from Heaven' by Charles Williams.



INKLINGS ARCHIVES 4: TOM SHIPPEY ~ ROLLAND HEIN

The speakers are:

[Track 1] Tom Shippey, author of the seminal 'Road to Middle-Earth' (1982) and the more recent 'Tolkien: Author of the Century' (2000), talking about the concept of the "righteous pagan" in Tolkien and other related literature. This is from a meeting held on 30th September 1982.

[Track 2] Rolland Hein, author of 'The Harmony Within: the Spiritual Vision of George MacDonald' (1982), and many other works, whose subject is "Dreams in George MacDonald's Lilit". This is from a meeting held on 29th June 1983.

Authenticated by a photograph of Tom Shippey's book 'The Road to Middle-Earth' and a copy of 'Lilit'.



INKLINGS ARCHIVES 5: GEORGE MACDONALD

The talks on this CD are from a meeting held on 17th February 1982.

The speakers are:

[Track 1] Stuart Blanch, then Archbishop of York, who talks about the theology of George MacDonald.

[Track 2] Stephen Prickett, author of 'Romanticism and Religion' and many other works, whose subject is "The Two Worlds of George MacDonald".

[Track 3] Nancy Ruthven, co-author with Kathleen Johnson of a musical version of "The Princess and the Goblin", extracts from which are performed within a narrative summary of the first act of the musical.

Authenticated by a photograph of an illustration from 'The Princess and the Goblin' by Charles Folkard.



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Priscilla Tolkien

Priscilla Tolkien

"...It is a long tale..." — Aragorn

This article or section needs **expansion** and/or modification. Please help the wiki by expanding it (http://tolkiengateway.net/w/index.php?title=Priscilla_Tolkien&action=edit) .

*"So please forgive me, dear Priscilla,
If I pretend you rhyme with pillow!"*
— J.R.R. Tolkien, *Letters from Father Christmas*

Priscilla Mary Anne Reuel Tolkien (June 18, 1929) is J.R.R. Tolkien's only daughter, the sister of Christopher Tolkien, Michael Tolkien, and John Tolkien. Before retiring she was a social worker.

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Bibliography

Books

- 1992: *The Tolkien Family Album* (with John Tolkien)

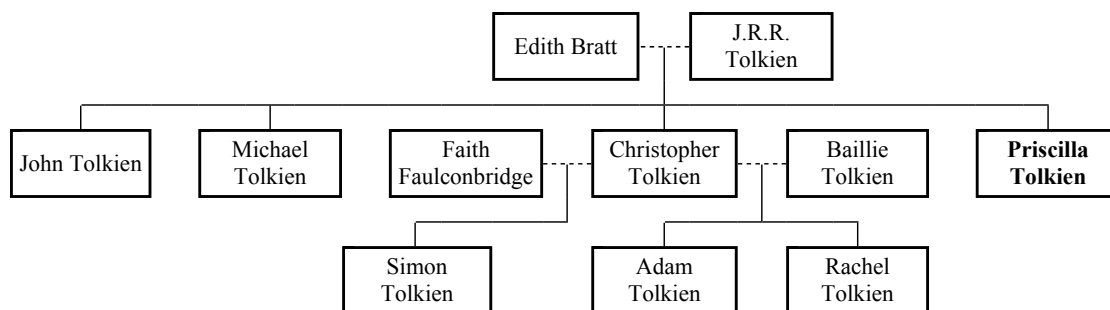
Articles

- 1976: *Amon Hen* 23 (December)
 - "My Father the Artist"
- 1976: *Over 21*, December
 - "Priscilla Tolkien Talks to Shirley Lowe" (p. 32)
- 1977: *Amon Hen* 29 ([?]November)
 - "Talk Given at the Church House Westminster on 16.9.77 by Priscilla Tolkien" (pp. 4-6)
- 1992: *A Tribute to J.R.R. Tolkien, 3 January 1892-2 September 1973: Centenary*. Ed. Rosemary Gray. Pretoria: Unisa Medieval Association.
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- J.R.R.T.: A Film Portrait of J.R.R. Tolkien (1996)
- Tolkien Remembered (1992)

Family Tree



Retrieved from "[http://tolkiengateway.net/wiki/Priscilla Tolkien](http://tolkiengateway.net/wiki/Priscilla_Tolkien)"

Categories: Articles needing expansion | British people | Letter receivers | People by name | Tolkien Family | Tolkien Society members

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